

EXHIBIT 3

StratFS Receivership
Summary of Invoices
3rd Interim Fee Application

	Invoice #	P/E	Fees	Expenses
Hodgson Russ LLP	1261349	8/31/2024	13,078.00	-
Hodgson Russ LLP	1265867	9/30/2024	10,121.00	-
Hodgson Russ LLP	1270142	10/31/2024	14,568.00	424.68
Hodgson Russ LLP	1274556	11/30/2024	8,730.50	-
Hodgson Russ LLP	1277779	12/31/2024	9,865.50	553.28
Hodgson Russ LLP	1281225	1/31/2025	10,806.50	394.76

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MCNAMARA SMITH LLP

Invoice Date: September 23, 2024
 Invoice Number: 1261349
 Matter Number: 103123.00000
 Billing Attorney: JCT

Please return this copy with your payment.

CURRENT INVOICE:

Professional Services	\$	13,078.00
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Total Current Invoice	\$	13,078.00
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Payable in U.S. Funds

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Albany, NY

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MCNAMARA SMITH LLP

Invoice Date: September 23, 2024
 Invoice Number: 1261349
 Matter Number: 103123.00000
 Billing Attorney: JCT

RE: CFPB RECEIVERSHIP - LOCAL COUNSEL

ITEMIZED SERVICES:

Date	Initials	Description	Hours	Amount
08/01/24	JCT	Conference with client on status of pending motions.	0.80	340.00
08/01/24	JCT	Attended status conference with client.	2.50	1,062.50
08/01/24	JCT	Conference with client on status conference and outstanding discovery issues and pending motions.	0.50	212.50
08/02/24	JCT	Reviewed DTC model from CIBC for call and prep for call with bank.	0.30	127.50
08/02/24	JCT	Telephone call with CIBC counsel regarding fee request and settlement and follow-up call with client following.	0.80	340.00
08/02/24	CSN	Conferred with lead counsel regarding questions on transcript for recent status conference.	0.10	22.00
08/02/24	CSN	Received and reviewed notice from 2nd Circuit Court of Appeals of filing rejection and conferred with JCT regarding same, multiple attempts to refile Notice of Appearance.	0.30	66.00
08/05/24	JCT	Emails with FDIC and client on put back of JPMC loans; emails regarding CIBC payment approvals and Salesforce negotiation.	0.30	127.50
08/05/24	CSN	Emails with lead counsel regarding transcript from recent status conference.	0.10	22.00
08/05/24	CSN	Attempted to refile Notice of Appearance in Appeal and calls to Clerk regarding same.	0.20	44.00
08/06/24	JCT	Telephone call with lender on request for Vacco attorney fees.	0.80	340.00
08/09/24	JCT	Reviewed correspondence with NYC landlord for call; telephone call with landlord's counsel regarding status of eviction	0.40	170.00
08/09/24	JCT	Reviewed/replied to vendor inquiries on payment status.	0.20	85.00

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September 23, 2024	Invoice Number:	1261349
	Matter Number:	103123.00000

Date	Initials	Description	Hours	Amount
08/09/24	JCT	Reviewed request from AAA on status of stay.	0.10	42.50
08/09/24	JCT	Telephone call with client on CIBC settlement and potential settlement with NYC landlord.	0.80	340.00
08/12/24	JCT	Reviewed/replied to email from counsel for Allego regarding termination of service and claim form.	0.40	170.00
08/12/24	JCT	Reviewed creditor emails and emails to SFS team regarding same; telephone call to NYC landlord regarding settlement.	0.40	170.00
08/12/24	JCT	Telephone call with client on updating revenue forecast for CIBC.	0.50	212.50
08/12/24	JCT	Telephone call with client, B. Reiss and J. O'Donnell on software license costs and revenue budget.	1.00	425.00
08/12/24	JCT	Reviewed correspondence with Avalon and call with creditor regarding same.	0.40	170.00
08/13/24	JCT	Telephone call with client and call with FDIC regarding JP Morgan put back of loans and deposit accounts.	0.50	212.50
08/13/24	JCT	Telephone call with counsel for CIBC regarding request for fees and status of draft operating budget.	0.20	85.00
08/14/24	JCT	Reviewed email from CIBC regarding updated forecast and email to J. O'Donnell regarding same; reviewed updated forecast and drafted email to client regarding same.	0.80	340.00
08/14/24	JCT	Reviewed updated Salesforce cost projections.	0.10	42.50
08/14/24	JCT	Reviewed marketing materials from potential brokers on sale of loan portfolio.	0.20	85.00
08/15/24	JCT	Telephone call with counsel for Versara note holder.	0.20	85.00
08/15/24	JCT	Telephone call with client and SFS Team on updated forecast for CIBC.	1.10	467.50
08/15/24	JCT	Telephone call with L. Smith regarding background to potential claims against third parties.	0.40	170.00
08/16/24	JCT	Telephone call with client on MMI proposal.	0.50	212.50
08/16/24	JCT	Drafted email to CIBC regarding revenue projections.	0.60	255.00

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September 23, 2024

Invoice Number: 1261349

Matter Number: 103123.00000

Date	Initials	Description	Hours	Amount
08/16/24	JCT	Telephone call with client and MMI on transfer of consumers to their platform.	1.40	595.00
08/19/24	JCT	Telephone call with law firm counsel on MMI proposal.	0.40	170.00
08/19/24	JCT	Reviewed/replied to emails regarding creditor activity from vendors.	0.40	170.00
08/20/24	JCT	Telephone call with NYC landlord counsel regarding global settlement and drafted email to client regarding same.	0.60	255.00
08/21/24	JCT	Email to NYC landlord counsel regarding removal of furniture and settlement.	0.20	85.00
08/21/24	JCT	Reviewed/revised letters to creditors regarding stay provisions of PI.	0.60	255.00
08/21/24	JCT	Reviewed fortress legal proposal from MMI.	0.80	340.00
08/22/24	JCT	Reviewed emails from creditors regarding accounts payable and drafted email to client on portfolio sale.	0.30	127.50
08/22/24	JCT	Telephone call with client on MMI proposal.	0.20	85.00
08/23/24	JCT	Reviewed 2nd Circuit mediation order; telephone call with CSN regarding status of all 2nd circuit appeals.	0.40	170.00
08/23/24	JCT	Reviewed 2nd Circuit order in Cedeno litigation and email to client regarding same.	0.20	85.00
08/23/24	CSN	Further review of docket for additional pleadings.	0.10	22.00
08/23/24	CSN	Call with JCT regarding cancellation of mediation and discussed same.	0.20	44.00
08/23/24	CSN	Review of docket for second appeal regarding status of same.	0.20	44.00
08/23/24	CSN	Emails with lead counsel and JCT regarding entry of judgment and recently filed stay letter and discussed same.	0.20	44.00
08/26/24	JCT	Reviewed CIBC revisions to settlement agreement.	0.90	382.50
08/26/24	JCT	Attended settlement conference with receiver.	5.50	2,337.50
08/27/24	JCT	Telephone call to Alianza counsel regarding stay letter and terminating service.	0.20	85.00

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September 23, 2024

Invoice Number: 1261349

Matter Number: 103123.00000

Date	Initials	Description	Hours	Amount
08/29/24	RKC	Telephone conference with client regarding insurance needs	0.30	139.50
08/29/24	JCT	Telephone call with Array on amounts due and claim form.	0.20	85.00
08/29/24	JCT	Reviewed/revised settlement agreement with CIBC.	0.50	212.50
08/29/24	JCT	Telephone calls with potential brokers for loan portfolio sale.	1.00	425.00
08/29/24	JCT	Reviewed/replied to email from L. Jones and review of TX bond for Atlas.	0.20	85.00
08/30/24	RKC	Communicated with J. Thoman regarding necessary insurances for current employees; communicated with client regarding same	0.20	93.00
08/30/24	JCT	Telephone call with Atlas bond broker and follow up email regarding renewal of bond issued for operation in Texas.	0.40	170.00
08/30/24	JCT	Telephone call with client on interviews with brokers for loan portfolio.	0.30	127.50
Professional Services				\$ 13,078.00
Total Current Invoice				\$ 13,078.00

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MCNAMARA SMITH LLP

Invoice Date: October 22, 2024
 Invoice Number: 1265867
 Matter Number: 103123.00000
 Billing Attorney: JCT

Please return this copy with your payment.

CURRENT INVOICE:

Professional Services	\$	10,121.00
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Total Current Invoice	\$	10,121.00
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Payable in U.S. Funds

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MCNAMARA SMITH LLP

Invoice Date: October 22, 2024
Invoice Number: 1265867
Matter Number: 103123.00000
Billing Attorney: JCT

RE: CFPB RECEIVERSHIP - LOCAL COUNSEL

ITEMIZED SERVICES:

Date	Initials	Description	Hours	Amount
09/04/24	JCT	Telephone call with client on capital call and status of law firms representing clients.	0.20	85.00
09/04/24	JCT	Reviewed/revised 2nd Fee application and declaration in support of same.	1.10	467.50
09/05/24	JCT	Reviewed/replied to email regarding capital contributions to Clover Funds and replied to same.	0.80	340.00
09/05/24	JCT	Reviewed/revised CIBC settlement agreement.	1.20	510.00
09/05/24	JCT	Reviewed invoice from NYC landlord and email to landlord counsel on status of settlement.	0.40	170.00
09/05/24	CSN	Drafted correspondence to the Court with courtesy copy of Second Interim Fee Application of Receiver and Professionals.	0.20	44.00
09/06/24	JCT	Reviewed/replied to emails on creditor activity and state registration for Versara.	0.40	170.00
09/09/24	JCT	Telephone call with L. Jones regarding maintaining Versara authorization to do business.	0.30	127.50
09/09/24	JCT	Telephone call with Receiver regarding CIBC settlement agreement.	1.30	552.50
09/09/24	JCT	Telephone call with receivership business team on potential customer refunds on Versara loans.	1.40	595.00
09/10/24	JCT	Telephone call with client regarding call with UBS regarding portfolio sale.	0.20	85.00
09/10/24	JCT	Reviewed/revised CIBC settlement agreement.	0.60	255.00

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October 22, 2024	Invoice Number:	1265867
	Matter Number:	103123.00000

Date	Initials	Description	Hours	Amount
09/10/24	JCT	Emails with creditors and client on ESOP vendor and loan portfolio sale.	0.40	170.00
09/11/24	JCT	Telephone call with UBS counsel on potential sale of Versara portfolio.	0.40	170.00
09/11/24	JCT	Reviewed/replied to emails from receiver team on creditor collection activity.	0.30	127.50
09/11/24	JCT	Drafted stay violation letter to Principal insurance.	0.80	340.00
09/11/24	JCT	Reviewed/revised CIBC settlement agreement and emails with client regarding same.	1.50	637.50
09/12/24	JCT	Emailed client and CIBC counsel on settlement.	0.20	85.00
09/12/24	JCT	Reviewed Blust Trust appellate brief.	0.80	340.00
09/16/24	JCT	Call with client on upcoming status conference and call with CIBC.	1.00	425.00
09/16/24	JCT	Reviewed Lipps fee application.	0.30	127.50
09/16/24	JCT	Prepared for and call with CIBC regarding settlement agreement.	1.20	510.00
09/16/24	JCT	Reviewed/replied to email from client on response to Blust Trust appellate briefing.	0.40	170.00
09/17/24	JCT	Reviewed/replied to client emails on creditor/vendor activity and stay.	0.40	170.00
09/17/24	JCT	Reviewed memo re: Versara/UBS facility and Versara DST Trust Agreement.	1.80	765.00
09/18/24	JCT	Reviewed of accounting analysis of intercompany transfers.	0.30	127.50
09/18/24	JCT	Reviewed Versara client refund calculations.	0.40	170.00
09/18/24	JCT	Reviewed/replied to creditor inquiry on stay provision of PI.	0.20	85.00
09/19/24	JCT	Call with UBS counsel on broker opinion of value and NDAs.	0.20	85.00
09/19/24	JCT	Calls with UBS and client on potential sale of Versara portfolio.	0.80	340.00
09/20/24	JCT	Reviewed/replied to plaintiff's appellate team on call to discuss responses.	0.10	42.50
09/20/24	JCT	Attended settlement conference with Receiver.	2.10	892.50

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October 22, 2024	Invoice Number:	1265867
	Matter Number:	103123.00000

Date	Initials	Description	Hours	Amount
09/20/24	JCT	Reviewed/revised NDA with broker on loan portfolio.	0.50	212.50
09/23/24	JCT	Reviewed Blust trust opposition to fee application.	0.10	42.50
09/23/24	JCT	Reviewed/replied to emails on NDA to value loan portfolio.	0.20	85.00
09/23/24	JCT	Telephone call with appellate counsel on Blust Trust appeal.	0.30	127.50
09/23/24	JCT	Drafted email to client on status of briefing Blust Trust appeal of fee application.	0.10	42.50
09/23/24	CSN	Began reviewing Rule 33.12 Notice for drafting.	0.10	22.00
09/23/24	CSN	Emails with JCT regarding Rule 33.12 Notice and conferred regarding same.	0.10	22.00
09/24/24	CSN	Drafted Rule 31.2 Scheduling Request in Second Circuit Appeal.	0.30	66.00
09/24/24	CSN	Drafted email to JCT with draft of Rule 31.2 Scheduling Request in Second Circuit Appeal and discussed same.	0.10	22.00
09/25/24	JCT	Reviewed/replied to email from client on authority over DST Trust.	0.50	212.50
09/25/24	JCT	Reviewed scheduling request for Blust Trust appeal of fee application.	0.10	42.50
09/26/24	JCT	Reviewed/responded to request for status update from AAA proceeding.	0.10	42.50

Professional Services	\$	10,121.00
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Total Current Invoice	\$	10,121.00
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MCNAMARA SMITH LLP

Invoice Date: November 25, 2024
 Invoice Number: 1270142
 Matter Number: 103123.00000
 Billing Attorney: JCT

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CURRENT INVOICE:

Professional Services	\$	14,568.00
Disbursements	\$	424.68
Total Current Invoice	\$	14,992.68

Payable in U.S. Funds

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MCNAMARA SMITH LLP

Invoice Date: November 25, 2024
Invoice Number: 1270142
Matter Number: 103123.00000
Billing Attorney: JCT

RE: CFPB RECEIVERSHIP - LOCAL COUNSEL

ITEMIZED SERVICES:

Date	Initials	Description	Hours	Amount
10/01/24	JCT	Reviewed summary of Versara customer refund issues and replied to email regarding same.	0.20	85.00
10/04/24	JCT	Reviewed email regarding complaint to collect receivable; email to receiver regarding same.	0.20	85.00
10/07/24	RKC	Reviewed and revised Monevo complaint	0.20	93.00
10/07/24	JCT	Reviewed Fidelis letter regarding dispute over discovery requests.	0.10	42.50
10/08/24	JCT	Reviewed emails regarding CIBC settlement.	0.10	42.50
10/08/24	JCT	Drafted email to A. Wall regarding Monevo complaint.	0.10	42.50
10/08/24	JCT	Reviewed emails from client and letter briefing regarding Fidelis Discovery.	0.30	127.50
10/09/24	JCT	Reviewed/replied to email from counsel for individuals in Cedeno litigation regarding substitution of counsel.	0.30	127.50
10/09/24	JCT	Reviewed pleadings on Fidelis as receivership defendant and discovery dispute in preparation for hearing.	1.40	595.00
10/09/24	JCT	Attended hearing on discovery dispute with Fidelis.	0.80	340.00
10/09/24	JCT	Telephone call with client on motion to compel production.	0.20	85.00
10/09/24	JCT	Drafted email to client on outcome of hearing and drafted email to landlord's counsel regarding lease termination and removal of FF&E.	0.20	85.00
10/10/24	JCT	Reviewed status of settlement agreement and call with CIBC counsel regarding same.	0.70	297.50

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November 25, 2024	Invoice Number:	1270142
	Matter Number:	103123.00000

Date	Initials	Description	Hours	Amount
10/10/24	JCT	Telephone call with counsel for individuals in ERISA litigation regarding Petition for Cert and substitution of counsel; drafted email to client regarding same.	0.70	297.50
10/11/24	JCT	Telephone call with client on status of CIBC settlement; potential settlement with law firms.	0.80	340.00
10/11/24	JCT	Reviewed email regarding Atlas licensing and drafted reply.	0.30	127.50
10/11/24	CSN	Drafted Motions to Appear Pro Hac Vice for L. Smith and A. Wall and supporting pleadings.	1.10	242.00
10/11/24	CSN	Emails with lead counsel regarding new case filing in WDNY and need for pro hac vice motions for L. Smith and A. Wall.	0.20	44.00
10/14/24	JCT	Reviewed reply to CIBC regarding Lippes fee request.	0.30	127.50
10/14/24	JCT	Reviewed email from creditor and drafted email to client group regarding same.	0.10	42.50
10/14/24	JCT	Reviewed pro hac vice applications for related litigation against Menovo.	0.30	127.50
10/16/24	JCT	Telephone call with client and defense counsel for individuals in Cedeno litigation; follow up call with client regarding same.	0.80	340.00
10/16/24	CSN	Conferred with lead counsel and JCT regarding assignment of judge in related WDNY case and pro hac vice motions.	0.30	66.00
10/16/24	CSN	Revised and finalized pro hac vice papers for A. Wall and L. Smith and drafted notice of appearance for JCT.	1.40	308.00
10/17/24	RKC	Conference with client regarding potential D&O claims; analyzed insurance policy to evaluate same	0.90	418.50
10/17/24	JCT	Telephone call with client and RKC regarding potential claims with insurance coverage.	0.50	212.50
10/17/24	JCT	Reviewed JPMC motion to transfer loans back to FDIC Receiver.	0.30	127.50
10/17/24	JCT	Reviewed email from DOL regarding benefit plans and draft response to client.	0.20	85.00
10/17/24	JCT	Reviewed request for instruction; correspondence with law firms on withdrawal from representation and call with law firms regarding same.	1.10	467.50

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November 25, 2024	Invoice Number:	1270142
	Matter Number:	103123.00000

Date	Initials	Description	Hours	Amount
10/17/24	JCT	Reviewed JPMC motion and drafted email to client regarding same.	0.40	170.00
10/17/24	JCT	Reviewed Royal/Hailstone motion to modify PI.	0.60	255.00
10/17/24	CSN	Drafted email to lead counsel with file stamped copies of pro hac vice motions of A. Wall and L. Smith.	0.20	44.00
10/17/24	CSN	Finalized and arranged for filing of pro hac vice motions of A. Wall and L. Smith.	0.50	110.00
10/18/24	JCT	Telephone call with Receiver and law firm counsel on potential withdrawal of representation/settlement of OTSC.	0.40	170.00
10/18/24	CSN	Revised and finalized attorney database form for lead counsel for filing to the docket.	0.20	44.00
10/18/24	CSN	Emails with lead counsel regarding need to file attorney database form and discussed same.	0.10	22.00
10/18/24	CSN	Received and reviewed Court notification regarding recent filing of Motions for Admission Pro Hac Vice for lead counsel and need to file attorney database form.	0.10	22.00
10/19/24	JCT	Reviewed CIBC markup of settlement agreement.	0.30	127.50
10/21/24	JCT	Reviewed bank revisions to settlement agreement and drafted email to client regarding same.	1.10	467.50
10/22/24	JCT	Telephone call with client on CIBC settlement terms.	0.90	382.50
10/22/24	JCT	Email to client regarding position on JPMC motion.	0.10	42.50
10/22/24	JCT	Emails regarding substitution of counsel for Strategic in Cedeno litigation.	0.10	42.50
10/22/24	JCT	Review of Blust Trust motion to extend deadlines on 2nd Cir. appeal.	0.10	42.50
10/23/24	JCT	Reviewed law firm motion to withdraw and draft letter to clients and client emails regarding same.	0.60	255.00
10/23/24	JCT	Drafted follow up letter to Principal regarding violation of stay.	0.50	212.50
10/23/24	JCT	Emails with counsel for Versara subordinated note holders.	0.10	42.50
10/23/24	JCT	Review of Versara intercreditor agreement and subordinate notes.	1.40	595.00

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November 25, 2024	Invoice Number:	1270142
	Matter Number:	103123.00000

Date	Initials	Description	Hours	Amount
10/24/24	JCT	Reviewed status of CIBC settlement agreement and call with bank counsel regarding same.	1.50	637.50
10/24/24	JCT	Reviewed letter from Principal regarding ESOP administration and email to its counsel regarding call to discuss.	0.20	85.00
10/24/24	JCT	Telephone call with counsel for note holders and drafted email to client regarding same.	0.80	340.00
10/24/24	JCT	Reviewed emails from client group on law firm transition plans and communications to clients; email to client on stay letter.	0.30	127.50
10/24/24	JCT	Telephone call with counsel for law firm involved in AAA arbitration which has named Strategic regarding application of stay.	0.20	85.00
10/25/24	JCT	Reviewed law firm motion to withdraw and letter to court regarding same.	0.40	170.00
10/25/24	JCT	Emails with SFS and Salesforce on contract negotiation.	0.20	85.00
10/25/24	JCT	Reviewed/revised stay letter to JAMS arbitrator in Soltani matter.	0.40	170.00
10/25/24	JCT	Reviewed emails on status of law firm withdrawal motion and contempt motion.	0.10	42.50
10/28/24	JCT	Emails with client on status of hearing on OTSC law firm contempt.	0.10	42.50
10/28/24	JCT	Telephone call with salesforce counsel and B. Reiss on contract re-negotiation and review of emails regarding same.	0.60	255.00
10/28/24	JCT	Reviewed emails from JAMS and plaintiffs counsel regarding Soltani litigation.	0.20	85.00
10/28/24	JCT	Telephone calls with counsel for note holders and client on Versara Lending obligations.	0.30	127.50
10/29/24	JCT	Reviewed Blust Trust appellate briefing in response to plaintiff's motion to dismiss appeal.	0.80	340.00
10/29/24	JCT	Drafted email to client on status of CIBC settlement discussions.	0.30	127.50
10/29/24	JCT	Telephone call with client on Strategic position on motion for instruction.	0.20	85.00
10/29/24	JCT	Reviewed receiver's request for instruction and opposition to same; telephone call to D. Vacco regarding settlement.	0.50	212.50

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Date	Initials	Description	Hours	Amount
10/29/24	JCT	Telephone call with counsel for Strategic on status of opposition to motion for instruction.	0.40	170.00
10/29/24	JCT	Reviewed plaintiff response to motion to extract Royal and Hailstone from receivership.	0.20	85.00
10/29/24	JCT	Reviewed valuation of Versara DST portfolio.	0.30	127.50
10/30/24	JCT	Drafted email to client on call to review Versara portfolio valuation.	0.10	42.50
10/30/24	JCT	Reviewed Strategic motion to modify PI and procedure for naming additional receivership entities.	0.70	297.50
10/30/24	JCT	Attended status conference with client and meeting with plaintiffs counsel regarding wind down plan.	2.80	1,190.00
10/31/24	JCT	Reviewed stipulations substituting counsel for 2nd Circuit appeals and email to individual defendant's counsel regarding same.	0.60	255.00
10/31/24	JCT	Telephone calls with ESOP administration provider and client on plan termination.	1.00	425.00
10/31/24	JCT	Telephone call with Garnett regarding valuation of portfolio and call with client regarding same.	1.10	467.50
10/31/24	CSN	Emails with lead counsel regarding transcript for recent motion hearing.	0.10	22.00

Professional Services \$ 14,568.00

ITEMIZED DISBURSEMENTS:

10/17/24	U. S. DISTRICT COURT CLERK, WESTERN DISTRICT OF NEW YORK - Pro Hac Vice Filing Fee for A. Wall in US District Court for Western District of New York	200.00
10/17/24	U. S. DISTRICT COURT CLERK, WESTERN DISTRICT OF NEW YORK - Pro Hac Vice Fee For Logan Smith in District Court for the Western District of New York.	200.00
10/31/24	Federal Express	24.68

Disbursements	\$	424.68
Total Current Invoice	\$	14,992.68

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MCNAMARA SMITH LLP

Invoice Date: December 23, 2024
 Invoice Number: 1274556
 Matter Number: 103123.00000
 Billing Attorney: JCT

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CURRENT INVOICE:

Professional Services	\$	8,730.50
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Total Current Invoice	\$	8,730.50
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Payable in U.S. Funds

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Albany, NY

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The Guaranty Building
140 Pearl Street, Suite 100
Buffalo, NY 14202-4040
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MCNAMARA SMITH LLP

Invoice Date: December 23, 2024
Invoice Number: 1274556
Matter Number: 103123.00000
Billing Attorney: JCT

RE: CFPB RECEIVERSHIP - LOCAL COUNSEL

ITEMIZED SERVICES:

Date	Initials	Description	Hours	Amount
11/01/24	JCT	Reviewed email from ESOP vendor on information needed for compliance and contacts.	0.20	85.00
11/01/24	JCT	Telephone call with client and ESOP counsel on plan termination.	0.90	382.50
11/01/24	JCT	Reviewed plaintiffs motion for PI on Fidelis et al.	1.30	552.50
11/04/24	JCT	Drafted email to client on denial of petition for Cert in ESOP litigation.	0.10	42.50
11/05/24	JCT	Telephone call with UBS counsel on preliminary valuation of Versara portfolio.	0.20	85.00
11/05/24	JCT	Reviewed CIBC credit agreement and schedules to determine whether bank has liens on Cell Gramercy 2 entity.	1.80	765.00
11/06/24	JCT	Telephone call with counsel to Versara subordinate lenders and email to client regarding same.	0.10	42.50
11/06/24	JCT	Reviewed emails on status of law firm withdrawal motion.	0.20	85.00
11/07/24	JCT	Reviewed proposed order on law firm motion to withdraw.	0.10	42.50
11/08/24	JCT	Reviewed ESOP and 401k termination resolutions and email to client regarding same.	0.20	85.00
11/08/24	JCT	Reviewed/replied to AAA on status of stay.	0.10	42.50
11/08/24	JCT	Reviewed/replied to emails from UBS, client and Garnet on sharing valuation.	0.30	127.50
11/08/24	JCT	Reviewed/replied to email from plaintiff in arbitration on application of stay.	0.10	42.50

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December 23, 2024	Invoice Number:	1274556
	Matter Number:	103123.00000

Date	Initials	Description	Hours	Amount
11/08/24	JCT	Reviewed proposed letter to law firm clients and FAQs and plaintiff's comments to same.	0.20	85.00
11/11/24	JCT	Reviewed resolutions authorizing Receiver to terminate ESOP and 401k and drafted email to Principal's counsel regarding same.	0.40	170.00
11/11/24	JCT	Reviewed/replied to email from L. Jones regarding on amending 401k plan.	0.10	42.50
11/11/24	JCT	Reviewed law firm briefing on Royal and Hailstone.	0.20	85.00
11/12/24	JCT	Emails with Garnett regarding ability to share valuation with lenders and call with CIBC regarding potential settlement.	0.50	212.50
11/12/24	JCT	Telephone call with counsel for Zeiss regarding Versara portfolio.	0.20	85.00
11/13/24	JCT	Reviewed Fidelis motion to dismiss and attended oral argument on motion to dismiss.	3.00	1,275.00
11/14/24	JCT	Telephone call with note holder's counsel and email to client regarding Versara financials.	0.10	42.50
11/14/24	JCT	Emails with court and Strategic team on consumer complaint.	0.10	42.50
11/14/24	CSN	Drafted and finalized correspondence to the Court with Receiver's Opposition.	0.20	44.00
11/15/24	JCT	Reviewed Receiver's and plaintiffs' responses to motion to modify PI.	0.40	170.00
11/15/24	JCT	Reviewed/replied to counsel for Zeiss regarding Versara portfolio valuation.	0.10	42.50
11/15/24	JCT	Reviewed default judgment entered against Versara Lending and drafted stay letter.	0.20	85.00
11/15/24	JCT	Telephone call with counsel for Zeiss regarding valuation of portfolio.	0.20	85.00
11/15/24	JCT	Telephone call with client on pending hearing on request for instruction and removal of entities from receivership and status of wind down plan for law firm service.	0.80	340.00
11/18/24	RKC	Analyzed Strategic Family's D&O policies; meeting with client regarding potential actions against officers and directors	1.80	837.00

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December 23, 2024	Invoice Number:	1274556
	Matter Number:	103123.00000

Date	Initials	Description	Hours	Amount
11/18/24	JCT	Reviewed emails on Law firm withdrawal and coordination with SFS on client communications.	0.40	170.00
11/18/24	JCT	Telephone call with L. Smith and A. Wall regarding potential litigation claims.	0.80	340.00
11/18/24	JCT	Telephone call with T. McNamara and L. Jones on payment of professional fees.	0.40	170.00
11/18/24	JCT	Reviewed SFS reply to response to motion to remove Atlas from receivership.	0.10	42.50
11/19/24	JCT	Reviewed stay letter regarding default judgment.	0.10	42.50
11/19/24	JCT	Reviewed motion to lift stay to dilute receivership entities interest in real estate investment and drafted email to client regarding same.	0.30	127.50
11/20/24	JCT	Attended hearing on motion to modify PI and remove law firms from receivership.	2.00	850.00
11/20/24	JCT	Conference with receiver on status of operations and wind down of law firm service.	0.80	340.00
11/20/24	JCT	Reviewed/replied to proposed motion to lift stay to dilute membership interests.	0.20	85.00
11/20/24	JCT	Drafted follow up email to counsel for NYC landlord on lease termination agreement.	0.10	42.50
11/21/24	CSN	Conferred with lead counsel regarding status of entry of orders granting pro hac vice for A. Wall and L. Smith; calls with Court Clerk regarding status of entry of orders granting pro hac vice for A. Wall and L. Smith; drafted update email to lead counsel regarding Court back-up for entry of orders.	0.20	44.00
11/22/24	JCT	Reviewed/replied to email inquiry on payments to notary firms.	0.10	42.50
11/25/24	CSN	Emails with JCT regarding appearance in 2 district court cases and discussed same.	0.20	44.00
11/25/24	CSN	Reviewed Court dockets regarding representation and status of same to respond to JCT.	0.20	44.00

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December 23, 2024

Invoice Number: 1274556
 Matter Number: 103123.00000

Date	Initials	Description	Hours	Amount
11/25/24	CSN	Conferred with lead counsel regarding status of entry of pro hac vice orders in sister federal case and reviewed docket, call to Court Clerk regarding status of entry of orders granting pro hac vice.	0.30	66.00
11/26/24	CSN	Conferred with JCT regarding two federal court cases where stay letters were filed and further discussed appearances in same and notices being received in same.	0.20	44.00
11/27/24	JCT	Reviewed Blust trust objection to order approving 2nd fee application.	0.40	170.00
11/27/24	JCT	Reviewed/replied to email from L. Jones on professional fee payments.	0.10	42.50
Professional Services				\$ 8,730.50
Total Current Invoice				\$ 8,730.50

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MCNAMARA SMITH LLP

Invoice Date: January 23, 2025
 Invoice Number: 1277779
 Matter Number: 103123.00000
 Billing Attorney: JCT

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CURRENT INVOICE:

Professional Services	\$	9,865.50
Disbursements	\$	553.28
Total Current Invoice	\$	10,418.78

Payable in U.S. Funds

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MCNAMARA SMITH LLP

Invoice Date: January 23, 2025
Invoice Number: 1277779
Matter Number: 103123.00000
Billing Attorney: JCT

RE: CFPB RECEIVERSHIP - LOCAL COUNSEL

ITEMIZED SERVICES:

Date	Initials	Description	Hours	Amount
12/02/24	JCT	Reviewed/revised stay letter and demand letter from Notaries 24-7.	0.40	170.00
12/02/24	JCT	Reviewed Vervent pleadings in consumer bankruptcy case which took judgment against Versara lending; email to CIBC regarding loan balances to UBS/Zeiss.	0.50	212.50
12/02/24	JCT	Drafted email to RKC regarding deadline to respond to Trust objection to fee application order.	0.10	42.50
12/03/24	JCT	Reviewed status of second amended complaint and motion to expand PI for application to spring legal and drafted response to counsel for debtor in litigation with Versara.	0.50	212.50
12/04/24	JCT	Prepared for and call with CIBC regarding settlement agreement.	0.70	297.50
12/04/24	JCT	Telephone call with client on update on potential sale of portfolio, wind-down plan and CIBC negotiation.	0.50	212.50
12/05/24	JCT	Telephone call with client on status of settlement with CIBC and Royal/Hailstone transition.	0.60	255.00
12/05/24	JCT	Reviewed consumer complaint from MO and drafted email to client regarding same.	0.20	85.00
12/06/24	JCT	Reviewed status update letter in Peerform litigation.	0.10	42.50
12/06/24	JCT	Reviewed chapter 13 plan, objection to claim and reviewed/replied to email from client on withdrawal of Versara POC in chapter 13 case.	0.80	340.00
12/09/24	JCT	Drafted follow up email to client on MO AG complaint by consumer.	0.10	42.50

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January 23, 2025	Invoice Number:	1277779
	Matter Number:	103123.00000

Date	Initials	Description	Hours	Amount
12/09/24	JCT	Reviewed/replied to email on UBS collateral reserve account.	0.10	42.50
12/09/24	JCT	Reviewed Atalaya term sheet regarding return of deposit.	0.60	255.00
12/09/24	CSN	Reviewed docket and various filings regarding the filing of a brief by Plaintiff's or an extension of time to file same.	0.20	44.00
12/09/24	CSN	Emails with JCT and lead counsel regarding status of filing brief in appellate case and discussed brief filed by Plaintiff's.	0.10	22.00
12/09/24	CSN	Subsequent emails with JCT and lead counsel regarding upcoming deadline to file brief.	0.10	22.00
12/10/24	JCT	Reviewed plaintiff's opposition to due process arguments on additional receivership defendants.	0.50	212.50
12/10/24	JCT	Telephone call with client on outcome of hearing today and status of settlement of law firm contempt.	0.30	127.50
12/10/24	JCT	Reviewed/revised enclosure letter and proposed order on request for instruction.	0.70	297.50
12/10/24	JCT	Settlement discussion with Monevo.	0.50	212.50
12/10/24	JCT	Attended hearing on Blust/Gustafson motions to dismiss and status conference on motion for order to remove Royal/Hailstone.	2.20	935.00
12/11/24	JCT	Drafted email to CIBC counsel on status of settlement agreement.	0.10	42.50
12/11/24	CSN	Conferred with lead counsel regarding transcript for yesterday's appearances and discussed same and conferred with court reporter regarding request for transcript of yesterday's proceedings.	0.20	44.00
12/11/24	CSN	Multiple discussions with court reporter regarding requesting transcript and drafted request form pursuant to instructions from court reporter.	0.30	66.00
12/11/24	CSN	Drafted correspondence to the Clerk's Office with courtesy copy of Receiver's filing, pursuant to request.	0.20	44.00
12/12/24	JCT	Reviewed collection activity and drafted reply emails to SFS staff.	0.20	85.00
12/12/24	JCT	Began review of CIBC markup of settlement agreement.	0.30	127.50

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January 23, 2025	Invoice Number:	1277779
	Matter Number:	103123.00000

Date	Initials	Description	Hours	Amount
12/12/24	CSN	Conferred with Court Reporter regarding request for transcript and revised transcript request submission and submitted same to Court Reporter.	0.50	110.00
12/12/24	CSN	Conferred with lead counsel regarding request for transcript.	0.10	22.00
12/12/24	CSN	Began drafting demand letter to Atalaya Capital and review of documents from client.	1.00	220.00
12/13/24	JCT	Reviewed CIBC edits to settlement agreement.	0.90	382.50
12/16/24	JCT	Reviewed/revised stay letters to creditors.	0.20	85.00
12/16/24	JCT	Reviewed/revised motion, declaration and proposed order on motion regarding payment processors.	1.80	765.00
12/16/24	CSN	Finalized Demand Letter to Atalaya and drafted email to JCT with draft of same and questions to finalize.	0.50	110.00
12/16/24	CSN	Conferred with Court Reporter and receipt of check and transcript request and updated client regarding same.	0.20	44.00
12/17/24	JCT	Reviewed Receiver's response to blust trust motion for reconsideration of fee application order.	0.40	170.00
12/17/24	JCT	Telephone call with Monevo counsel regarding settlement.	0.50	212.50
12/17/24	CSN	Drafted correspondence to the Court with courtesy copy of Receiver's Response to Blust Family Objection to Order on Second Fee Application.	0.10	22.00
12/18/24	JCT	Reviewed/revised demand letter to recover Atalaya deposit.	0.40	170.00
12/18/24	JCT	Telephone call with L. Jones regarding demand letter and Pier Capital interest in Versara.	0.30	127.50
12/18/24	CSN	Emails with JCT regarding draft of Demand Letter to Atalaya.	0.10	22.00
12/18/24	CSN	Call with client regarding draft of Demand Letter and questions regarding same.	0.20	44.00
12/18/24	CSN	Finalized Demand Letter to Atalaya.	0.20	44.00
12/18/24	CSN	Drafted email to client and JCT with draft of Demand Letter to Atalaya and emails with client regarding draft.	0.10	22.00
12/19/24	JCT	Reviewed R&R on Fidelis motion to dismiss complaint.	0.60	255.00

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January 23, 2025	Invoice Number:	1277779
	Matter Number:	103123.00000

Date	Initials	Description	Hours	Amount
12/19/24	JCT	Settlement call with Monevo.	0.50	212.50
12/19/24	CSN	Emails with client and JCT regarding demand letter and possible revisions to same.	0.20	44.00
12/19/24	CSN	Emails with lead counsel regarding request for extension of time in the Monevo case and reviewed extension request.	0.10	22.00
12/19/24	CSN	Reviewed Letter of Intent to respond to questions raised by JCT and responded regarding same.	0.30	66.00
12/20/24	JCT	Calls with LJ and TM regarding CIBC settlement and opposition to Clover motion to modify stay and cross motion.	1.50	637.50
12/20/24	JCT	Review of defendant's opposition to Clover motion to modify stay and cross motion; draft email to client regarding same.	0.40	170.00
12/23/24	JCT	Email with LJ regarding recovery of Atalaya deposit.	0.10	42.50
12/23/24	JCT	Call with client and SFS on forecast for CIBC settlement.	0.80	340.00
12/23/24	JCT	Review of ability to address deposit placed by Fusion.	0.20	85.00
12/23/24	CSN	Emails with client regarding questions if Fusion is a receivership defendant for purposes of demand letter.	0.10	22.00
12/23/24	CSN	Followed up with JCT regarding questions raised on Demand Letter to Atalaya and phone call with JCT to discuss same.	0.10	22.00
12/23/24	CSN	Emails with lead counsel regarding filing of Motion to Pay Funds to Customers.	0.10	22.00
12/23/24	CSN	Followed up with Court Reporter regarding receipt of transcript for today's deadline to receive same.	0.10	22.00
12/23/24	CSN	Drafted correspondence to the Court with copy of filed Motion to Pay Funds pursuant to request from lead counsel.	0.10	22.00
12/24/24	JCT	Call with plaintiffs and receiver on capital calls and email to chambers regarding objection deadline.	1.00	425.00
12/24/24	JCT	Review/revise demand letter to Atalaya.	0.30	127.50
12/24/24	CSN	Drafted email to lead counsel with copy of transcript from court reporter.	0.10	22.00

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January 23, 2025	Invoice Number:	1277779
	Matter Number:	103123.00000

Date	Initials	Description	Hours	Amount
12/24/24	CSN	Emails with court reporter regarding requested transcript and reviewed same.	0.10	22.00
12/24/24	CSN	Conferred with JCT regarding client email and revised demand letter accordingly and received JCT's comments on same.	0.50	110.00
12/24/24	CSN	Received and reviewed email from client in response to questions on receivership defendants.	0.10	22.00
12/27/24	CSN	Drafted email to client with finalized demand letter that was served on Atalaya.	0.10	22.00
12/27/24	CSN	Followed up with JCT regarding status of demand letter to Atalaya and conferred regarding same and wire instructions received from client.	0.10	22.00
12/27/24	CSN	Drafted email to client with draft of final demand letter for service and arranged for service of same.	0.10	22.00
12/27/24	CSN	Finalized demand letter for service.	0.10	22.00
Professional Services				\$ 9,865.50
ITEMIZED DISBURSEMENTS:				
12/12/24		BONNIE S. WEBER, RPR - Transcript Copy – December 10, 2024 hearing		526.50
12/31/24		Federal Express		26.78
Disbursements				\$ 553.28
Total Current Invoice				\$ 10,418.78

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MCNAMARA SMITH LLP

Invoice Date: February 21, 2025
 Invoice Number: 1281225
 Matter Number: 103123.00000
 Billing Attorney: JCT

Please return this copy with your payment.

CURRENT INVOICE:

Professional Services	\$	10,806.50
Disbursements	\$	394.76
Total Current Invoice	\$	11,201.26

Payable in U.S. Funds

Thank you for your business.

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Buffalo, NY

Greensboro, NC

Hackensack, NJ

New York, NY

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Rochester, NY

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MCNAMARA SMITH LLP

Invoice Date: February 21, 2025
Invoice Number: 1281225
Matter Number: 103123.00000
Billing Attorney: JCT

RE: CFPB RECEIVERSHIP - LOCAL COUNSEL

ITEMIZED SERVICES:

Date	Initials	Description	Hours	Amount
01/03/25	JCT	Reviewed Soltani litigation documents filed against SFS.	0.20	92.00
01/03/25	JCT	Reviewed/replied to request for payment of JAMS arbitration fees.	0.10	46.00
01/03/25	JCT	Reviewed/replied to email from client's staff on status of NYC landlord billing.	0.10	46.00
01/06/25	JCT	Finalized stay letter regarding Soltani arbitration.	0.10	46.00
01/09/25	JCT	Reviewed email from client on status of Blust contempt motion.	0.10	46.00
01/10/25	JCT	Reviewed/revised CIBS settlement agreement.	1.20	552.00
01/10/25	JCT	Telephone calls with receiver on hearing on contempt motion and PI application.	0.80	368.00
01/13/25	JCT	Emails to receiver and SFS on providing updated financial information on Versara and SFS operations.	0.10	46.00
01/14/25	JCT	Telephone call from Atalaya counsel on demand letter for diligence deposit.	0.20	92.00
01/14/25	JCT	Reviewed/replied to email from AAA on status of arbitration.	0.10	46.00
01/14/25	JCT	Drafted email to T. McNamara regarding subpoenas for OSC hearing.	0.10	46.00
01/15/25	JCT	Finalized draft CIBC settlement turn and drafted email to bank counsel regarding same.	0.30	138.00
01/17/25	JCT	Telephone call with chambers on hearing procedure for witnesses and drafted email to receiver and call with receiver regarding same.	0.70	322.00

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February 21, 2025	Invoice Number:	1281225
	Matter Number:	103123.00000

Date	Initials	Description	Hours	Amount
01/17/25	CSN	Drafted correspondence submitting Receiver's Hearing Brief and related pleadings to the Court pursuant to request.	0.20	47.00
01/17/25	CSN	Emails with lead counsel and JCT regarding SL Green Invoice and discussed same.	0.10	23.50
01/17/25	CSN	Emails with lead counsel regarding post hearing brief and related filings by Receiver.	0.10	23.50
01/21/25	JCT	Reviewed proposed order on motion to lift stay.	0.20	92.00
01/21/25	JCT	Reviewed correspondence on witnesses not appearing at OSC hearing; reviewed status of Hernandez litigation and application of stay.	0.60	276.00
01/21/25	JCT	Telephone call with CIBC regarding settlement stipulation.	0.60	276.00
01/21/25	JCT	Telephone call with J. O'Donnell on forecast for CIBC stipulation.	0.70	322.00
01/21/25	CSN	Emails with lead counsel regarding upcoming hearing and preparations for same and subsequent emails regarding exhibit list and exhibits.	0.30	70.50
01/21/25	CSN	Received and reviewed final documents and exhibits to be used at hearing and began assembling same.	0.30	70.50
01/22/25	JCT	Reviewed pre trial briefing for evidentiary hearing on PI	1.80	828.00
01/22/25	CSN	Drafted correspondence to the Court with filing pursuant to request from lead counsel.	0.10	23.50
01/22/25	CSN	Multiple emails with lead counsel in preparation of this week's hearings.	0.10	23.50
01/22/25	CSN	Worked to prepare and assemble documents in preparation of this week's hearings.	1.00	235.00
01/23/25	JCT	Attended hearing on Receiver's OSC and plaintiff's motion for PI and conferences with client regarding same.	5.50	2,530.00
01/23/25	CSN	Drafted correspondence to the Court with exhibit list and exhibit binder for evidentiary hearing.	0.20	47.00
01/24/25	JCT	Reviewed landlord draft settlement stipulation.	1.00	460.00

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February 21, 2025	Invoice Number:	1281225
	Matter Number:	103123.00000

Date	Initials	Description	Hours	Amount
01/27/25	CSN	Emails with lead counsel regarding requesting transcript of evidentiary hearing (2 days) and provided summary of charges from last request.	0.20	47.00
01/27/25	CSN	Subsequent emails with court reporter regarding request and additional questions and confirmed request of same.	0.20	47.00
01/27/25	CSN	Subsequent emails with lead counsel regarding cost and timing for transcript request and discussed same.	0.20	47.00
01/27/25	CSN	Drafted email to court reporter with request for transcripts and discussed page count and cost per page.	0.20	47.00
01/28/25	JCT	Telephone call with client on CIBC forecast for operations and cash collections and discuss terms of settlement agreement.	1.00	460.00
01/28/25	JCT	Telephone call with client on cash flow forecast for operations.	0.80	368.00
01/28/25	CSN	Conferred with Court Reporter regarding receipt of check for hearing transcript and delivery of same.	0.20	47.00
01/28/25	CSN	Drafted correspondence to the Court Reporter with check for payment of requested hearing transcripts.	0.20	47.00
01/29/25	JCT	Telephone call with client on addressing clover motion to compel Receiver.	0.90	414.00
01/29/25	JCT	Reviewed motion to extend deadlines in 2nd circuit appeal and email to client regarding same.	0.10	46.00
01/29/25	JCT	Reviewed/revised settlement agreement with NYC landlord.	0.90	414.00
01/29/25	CSN	Received and reviewed hearing transcripts from Court Reporter and conferred regarding same.	0.20	47.00
01/29/25	CSN	Drafted email to lead counsel with hearing transcripts from Court Reporter.	0.10	23.50
01/30/25	JCT	Reviewed/revised CIBC settlement agreement.	1.30	598.00
01/30/25	JCT	Reviewed/revised stipulation with NYC landlord and email to client regarding same.	1.10	506.00
01/31/25	JCT	Reviewed stipulation regarding Royal/Hailstone.	0.20	92.00
01/31/25	JCT	Reviewed Versara Lending Financials.	0.70	322.00

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February 21, 2025

Invoice Number: 1281225
Matter Number: 103123.00000

Professional Services \$ 10,806.50

ITEMIZED DISBURSEMENTS:

01/27/25	BRANDI WILKINS - Hearing Transcript	369.75
01/31/25	Federal Express	25.01

Disbursements	\$	394.76
Total Current Invoice	\$	11,201.26